

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BEST PARTNERS MORTGAGE  
COOPERATIVE, INC. d/b/a LENDERS ONE,

Plaintiff,

v.

PLAZA HOME MORTGAGE, INC.,

Defendant.

Civil Action No.: 1:24-cv-05184-VSB

**DECLARATION OF ALEXANDER M. SUGZDA IN SUPPORT OF DEFENDANT’S  
OPPOSITION TO PLAINTIFF’S MOTION FOR JUDGMENT ON THE PLEADINGS,  
MOTION TO STRIKE AFFIRMATIVE DEFENSES, AND MOTION TO STAY  
DISCOVERY**

ALEXANDER M. SUGZDA, an attorney admitted to practice law before the Courts of the State of New York, under penalty of perjury, declares and states as follows:

1. I am a Partner at the law firm of Cohen Ziffer Frenchman & McKenna LLP, attorneys for Defendant Plaza Home Mortgage, Inc. (“Plaza”). I submit this Declaration in support of Plaza’s Opposition to Plaintiff’s Motion for Judgment on the Pleadings, Motion to Strike Affirmative Defenses, and Motion to Stay Discovery.

2. A copy of the Complaint in *Plaza Home Mortgage, Inc. v. Ass’n of Certified Mortgage Originators Risk Retention Group, Inc.*, No. 1:24-cv-02191 (S.D.N.Y.) (the “ACMO Action”), filed on the docket as ECF No. 1 on March 22, 2024, is attached hereto as Exhibit A. The Association of Certified Mortgage Originators Risk Retention Group, Inc. (“ACMO”), CastleLine Risk & Insurance Services, LLC (“CastleLine”), and Altisource Portfolio Solutions, Inc. (“APSI”) are defendants in the ACMO Action.

3. A copy of Altisource Portfolio Solutions, S.A.’s (“Altisource”) Annual Report (Form 10-K) for the fiscal year ending Dec. 31, 2023, filed with the SEC on March 7, 2024, is attached hereto as Exhibit B.

4. Based on Plaza’s dealings with Lenders One, ACMO, CastleLine, and APSI, it is Plaza’s understanding that these entities act in concert under the umbrella of Altisource.

5. Plaza has served discovery in this Action and the ACMO Action to discover additional information concerning the relationship between each of these entities.

6. In the ACMO Action, ACMO, CastleLine, and APSI served their Objections and Responses to Plaza’s First Set of Requests for Production on August 30, 2024. In response to many of Plaza’s requests for production, the defendants stated that “APSI does not possess any responsive documents.” However, individuals involved in the insurance claims at issue in the ACMO Action use “altisource.com” email addresses. On September 23, 2024, Plaza sent defendants a letter noting this and has not yet received a response.

7. On September 24, 2024, Plaza and Best Partners Mortgage Cooperative, Inc. d/b/a Lenders One’s (“Lenders One”) filed a joint status letter and [Proposed] Case Management Plan and Scheduling Order (the “Proposed Scheduling Order”). ECF Nos. 14, 14-1.

8. Pursuant to the dates in the Proposed Scheduling Order, the parties exchanged initial disclosures on October 8, 2024, and exchanged initial requests for the production of documents and interrogatories on October 18, 2024.

9. A copy of Plaza’s First Set of Interrogatories to Plaintiff, served on Lenders One on October 18, 2024, is attached hereto as Exhibit C.

10. A copy of Plaza’s First Set of Requests for Production of Documents to Plaintiff, served on Lenders One on October 18, 2024, is attached hereto as Exhibit D.

11. Plaza served its responses to Lenders One's initial discovery requests on November 18, 2024. Lenders One has not served its responses to Plaza's First Set of Interrogatories to Plaintiff or First Set of Requests for Production of Documents to Plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of December, 2024.

/s/ Alexander M. Sugzda  
Alexander M. Sugzda